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July 6, 2021

Clerk, U.S. District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Jane Doe v. La'Quetta Small, et al.
Civil Action No. 1:21-cv-11189-JHR-AMD

Dear Sir/Madam:

I have entered an appearance for defendant, La'Quetta Small, in the above referenced matter.

On July 2, 2021, counsel for plaintiff filed a request for default against La'Quetta Small (Docket No. 15). In support of that request, plaintiff's counsel falsely certified that La-Quetta Small has failed to answer or otherwise move within the time provided by the Rules of Court or by Order.

Plaintiff's counsel has apparently overlooked the fact that a timely application for a Clerk's Order extending the time by which Ms. Small may answer or otherwise was applied for on June 21, 2021 and granted on June 23, 2021. As the response by Ms. Small to the complaint is not due until July 8, 2021, I respectfully ask that plaintiff's application be denied.

Respectfully yours,

/s/ Jeffrey L. Shanaberger

Jeffrey L. Shanaberger

JLS/pm
enclosure